

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

THE STEP2 COMPANY, LLC,

Plaintiff,

v.

LEDGE LOUNGER, INC.,

Defendant.

Case No. 5:24-cv-807

Judge David A. Ruiz

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND**

Defendant, Ledge Lounger, Inc. (“Ledge Lounger”), through counsel, hereby moves this Court for an extension of time until July 8, 2024 to answer or respond to the Complaint. Counsel for Ledge Lounger conferred with counsel for Plaintiff, The Step2 Company LLC (“Step2”) and Step2 has consented to Ledge Lounger’s motion. In support, Ledge Lounger states the following:

1. On May 6, 2024, Plaintiff filed its Complaint.
2. The Clerk issued the Summons on May 7, 2024.
3. Defendant’s counsel conferred with Plaintiff’s counsel on May 29, 2024 regarding the requested extension and Plaintiff does not oppose Defendant’s request.
4. Good cause exists for an extension of time. Ledge Lounger is an out-of-state entity based in Texas and needed time to retain counsel for this litigation. The additional time will also allow the parties to discuss a possible resolution.
5. This is the first request for an extension of time, and the request is made in the interests of justice and not for purposes of delay.

WHEREFORE, Defendant respectfully requests that the Court enter an Order granting its

Unopposed Motion for an Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint, extending the deadline up to and including July 8, 2024.

Date: June 4, 2024

Respectfully submitted,

/s/ Drew H. Campbell

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*Attorney for Defendant Ledge Lounger,
Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 4, 2024, a copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD was filed with the Clerk of the Court using the CM/ECF System, which sent notification of such filing to all counsel of record.

/s/ Drew H. Campbell

Drew H. Campbell (0047197)